

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

SHANNI SNYDER,	)	
	)	
Plaintiff,	)	
	)	<b>2:21-cv-00904-RJC</b>
v.	)	
	)	
U LOCK INC., also known as	)	
U-LOCK INC.,	)	
	)	
Defendant.	)	

MOTION FOR DEFAULT JUDGMENT

AND NOW COMES Plaintiff Shanni Snyder and moves this Court for a default judgment against the defendant in this case.

1. Plaintiff's Complaint alleges violations of the Fair Labor Standards Act.
2. The Complaint seeks a sum certain based on violations of federal wage laws where the Plaintiff was employed, did not receive minimum wage or overtime salary, due to the financial condition of the defendant.
3. The Defendant is in default, which constitutes an admission of the facts.
4. Therefore, default judgment should be entered in the amount of \$131,351 along with pre-judgment and post-judgment interest.

WHEREFORE, Plaintiff respectfully prays that this Court enter a default judgment in the amount of \$131,351 and pre-judgment and post-judgment interest, and costs in the amount of \$402 (filing fee).

Dated this 15th day of September, 2021.

Respectfully submitted,

/s/ Shanni Snyder  
Shanni Snyder  
14390 Route 30  
North Huntingdon PA 15642

PLAINTIFF

CERTIFICATE OF SERVICE

I, Shanni Snyder, certify that I mailed a true and correct copy of the foregoing on this 15th day of September 2021, by First Class Mail to:

U Lock Inc.  
U-Lock Inc.  
14140 Route 30  
North Huntingdon PA 15137

/s/ Shanni Snyder  
Shanni Snyder